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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NAVIGATOR BUSINESS SERVICES LLC,

Plaintiff,

20-cv-6159 (AMD)(CLP)

- against -

REPLY TO COUNTERCLAIM

AIGUANG CHEN and JIN WU YU,

Defendants.

-----X

Plaintiff Navigator Business Services LLC, by its undersigned attorneys, Silverman Shin & Byrne PLLC, as and for its Reply to the Counterclaim of Defendants, alleges:

1. Denies the truth of the allegation of the Counterclaim.

FIRST AFFIRMATIVE DEFENSE

2. The Counterclaim fails to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

3. Plaintiff acted reasonably and in good faith in filing the within action. Accordingly, pursuant to Section 9C of the Guaranty executed by each Defendant, each Defendant has waived all claims for loss and damage.

WHEREFORE, Plaintiff demands judgment against Defendants as follows:

- a. Dismissing the Counterclaim in its entirety; and
- b. Granting such other and further relief as to which this Court deems just and proper, including the cost and disbursements of this action.

Dated: New York, New York
March 1, 2021

SILVERMAN SHIN & BYRNE PLLC

By: /s/ Donald F. Schneider
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